

SDNY (Rev. 10/2006) Pro Hac Vice Motion to Admit Counsel

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

PATRICIA DRAYTON, VALERIE KIRK,  
and et al.,

Plaintiffs,

1:07-cv-06315-RMB

-against-

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

TOY US, INC. et al

## Defendants

PURSUANT TO RULE 1.3 ( c ) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Nancy Ledy-Gurren, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Ronald Cherry  
Firm Name: Cherry & Jenifer, P.A.  
Address: 7825 York Road  
City/State/Zip: Towson, Maryland 21204-4718  
Phone Number: 410-494-4954  
Fax Number: 410-494-4952

Ronald Cherry is a member in good standing of the Bar of the State of Maryland.

There are no pending disciplinary proceeding against Ronald Cherry in any State or Federal Court.

Dated: December 11, 2007  
New York, New York

Respectfully submitted,

Sponsor's Name: Nancy Ledy-Gurren  
SDNY Bar No. 2186  
Firm Name: Ledy-Gurren, Bass & Siff, LLP  
Address: 475 Park Avenue South  
8<sup>th</sup> floor  
City/State/Zip: New York, New York 10016  
Phone Number: 212-447-1111  
Fax Number: 212-447-6686

U.S. DISTRICT COURT  
2009 JUN 7 PM 1:57  
S.D. WASH.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

PATRICIA DRAYTON, VALERIE KIRK,  
and et al.,

Plaintiffs,

**1:07-cv-06315-RMB**

-against-

TOY US, INC., et al

Defendants

**AFFIDAVIT OF  
NANCY LEDY-GURREN  
IN SUPPORT OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

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State of New York  
County of New York

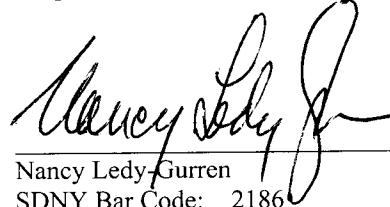
Nancy Ledy-Gurren, being duly sworn, hereby deposes and says as follows:

1. I am counsel for Toys "R" Us-Delaware, Inc. S/h/a Toys Us, Inc., Toys "R" Us-NY, LLC, Vic DeBlassi, Richard Fernandez, Jose Nieves, and George Aponte [the "Toys "R" Us Defendants], in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Ronald Cherry as counsel pro hac vice to represent Toys "R" Us-Delaware, Inc. S/h/a Toys Us, Inc., Toys "R" Us-NY, LLC, Vic DeBlassi, Richard Fernandez, Jose Nieves, and George Aponte [the "Toys "R" Us Defendants], in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice in March, 1976. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Ronald Cherry since 2000.
4. Ronald Cherry is a partner of Cherry & Jenifer, P.A. in Towson, Maryland.
5. I have found Mr. Cherry to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move for the admission of Ronald Cherry, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Ronald Cherry, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Ronald Cherry, pro hac vice, to represent Defendants in the above captioned matter, be granted.

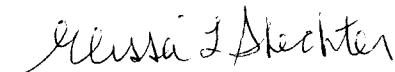
Dated: December 11, 2007  
New York, New York

Respectfully submitted,

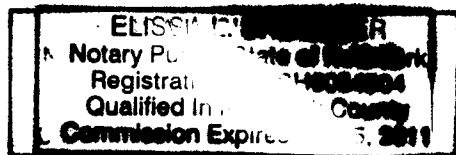


Nancy Ledy Gurren  
SDNY Bar Code: 2186

Sworn to before me this  
11<sup>th</sup> day of December, 2007



Melissa L. Skeetner





# Certificate of Good Standing

UNITED STATES OF AMERICA

DISTRICT OF MARYLAND

I, Felicia C. Cannon, Clerk of the United States District Court for the District of Maryland,

DO HEREBY CERTIFY that, RONALD M. CHERRY, ESQUIRE, BAR NUMBER 07927, was duly admitted to practice in the United States District Court for the District of Maryland on June 4, 1982, and is currently in good standing as a member of the bar of this Court.

Dated at Baltimore, Maryland

FELICIA C. CANNON

Clerk

Date: December 17, 2007

  
Tina Stavrou - Deputy Clerk

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

PATRICIA DRAYTON, VALERIE KIRK,  
and et al.,

Plaintiffs,

**1:07-cv-06315-RMB**

-against-

TOY US, INC. et al

Defendants

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion of Nancy Ledy-Gurren attorney for Toys "R" Us-Delaware, Inc. s/h/a Toys "R" Us-NY, LLC, Vic DeBlassi, Richard Fernandez, Jose Nieves, and George Aponte [the Toys "R" Us Defendants] and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Applicant's Name: Ronald Cherry

Firm Name: Cherry & Jenifer, P.A.

Address: 7825 York Road

City/State/Zip: Towson, Maryland 21204-4718

Telephone/Fax: 410-494-4954/410-494-4952

Email Address: rcherry@cherryjeniferlaw.com

is admitted to practice pro hac vice as counsel for Toys "R" Us-Delaware, Inc. s/h/a Toys "R" Us-NY, LLC, Vic DeBlassi, Richard Fernandez, Jose Nieves, and George Aponte [the Toys "R" Us Defendants] in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: December 11, 2007  
New York, New York

United States District/ Magistrate Judge

**AFFIDAVIT OF SERVICE**

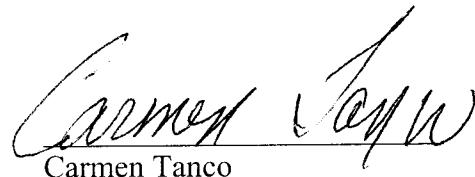
STATE OF NEW YORK )  
                          ) ss.:  
COUNTY OF NEW YORK )

CARMEN TANCO, being duly sworn, deposes and says: that deponent is not a party to the action, is over 18 years of age and resides in Bronx, New York.

That on the 28<sup>th</sup> of December, 2007, deponent served the within **MOTION TO ADMIT COUNSEL PRO HAC VICE, AFFIDAVIT OF NANCY LEDY-GURREN IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE, ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTIN and CERTIFICATE OF GOOD STANDING for RON CHERRY** upon:

Emmanuel Roy, Esq.  
New Start, LLC  
32 Court Street - #201  
Brooklyn, NY 10201

at the address designated by said attorney(s) for that purpose by depositing a true copy of the same enclosed in a postpaid, properly addressed wrapper, in an official depository under the exclusive care and custody of the United States Post Office within the State of New York.



Carmen Tanco

Sworn to before me this  
28<sup>th</sup> day of December, 2007

  
Notary Public

DANIEL E. SIFF  
Notary Public, State of New York  
No. 02SI3662868  
Qualified in Bronx County  
Commission Expires May 31, 2011